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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E-Filed

MARSHA A. BEDWELL, State Bar No. 094860
General Counsel
mbedwell@cde.ca.gov
AMY DISSON HOLLOWAY, State Bar No. 163731
Assistant General Counsel
aholloway@cde.ca.gov
REBECCA P. FREIE, State Bar No. 072253
Deputy General Counsel
rfreie@cde.ca.gov
California Department of Education
1430 N Street, Room 5319
Sacramento, CA 95814
Telephone: (916) 319-0860
Facsimile: (916) 319-0155
Email: RFreie@cde.ca.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JENNIFER CHANG, by and through her parents,
NORMAN AND LINA CHANG,,

Plaintiff,

v.

CALIFORNIA SCHOOL FOR THE DEAF,
CALIFORNIA DEPARTMENT OF EDUCATION,
and FREMONT UNIFIED SCHOOL DISTRICT,

Defendants.

Case No. C06-02337 JSW

MOTION TO FILE DOCUMENTS
UNDER SEAL, [PROPOSED]
ORDER
(Local Rule 79-5)

Date: September 29, 2006

Time: 9:00 a.m.

Courtroom: 2

Judge: Jeffrey S. White

Pursuant to Local Rule 79-5, State Defendants, hereby move for an Ex Parte Order permitting State Defendants to file, under seal, a settlement agreement executed by the parties, and or representatives of the parties to this action, in December 2004. This agreement contains the following provision: "The parties agree that this Agreement shall remain confidential between the parties, with the exception that this agreement shall be admissible in any action to enforce its terms." Attorneys

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Case No. C 06-02337 JSW

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STATE DEFS. MOTION TO FILE DOCUMENT UNDER
SEAL; [PROPOSED] ORDER No. C06-02337 JSW

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1 representing the other parties in this matter have stipulated to sealing the December 2004 settlement
2 agreement.

3 Dated: August 21, 2006

Respectfully submitted,

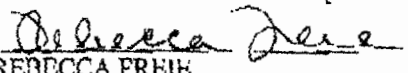
MARSHA A. BEDWELL

General Counsel

AMY BISSON HOLLOWAY

Assistant General Counsel

By:


RENECCA FREIE

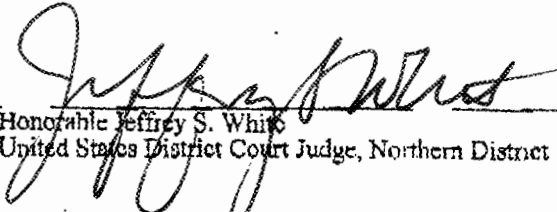
Deputy General Counsel

Attorneys for Defendants

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS ORDERED the document be filed under seal in
compliance with Local Rule 79-5.

Dated: AUG 25 2006


Honorable Jeffrey S. White
United States District Court Judge, Northern District